

-3-

Mr. Jason Renschler

**Obtaining a "Non-Firearm"**

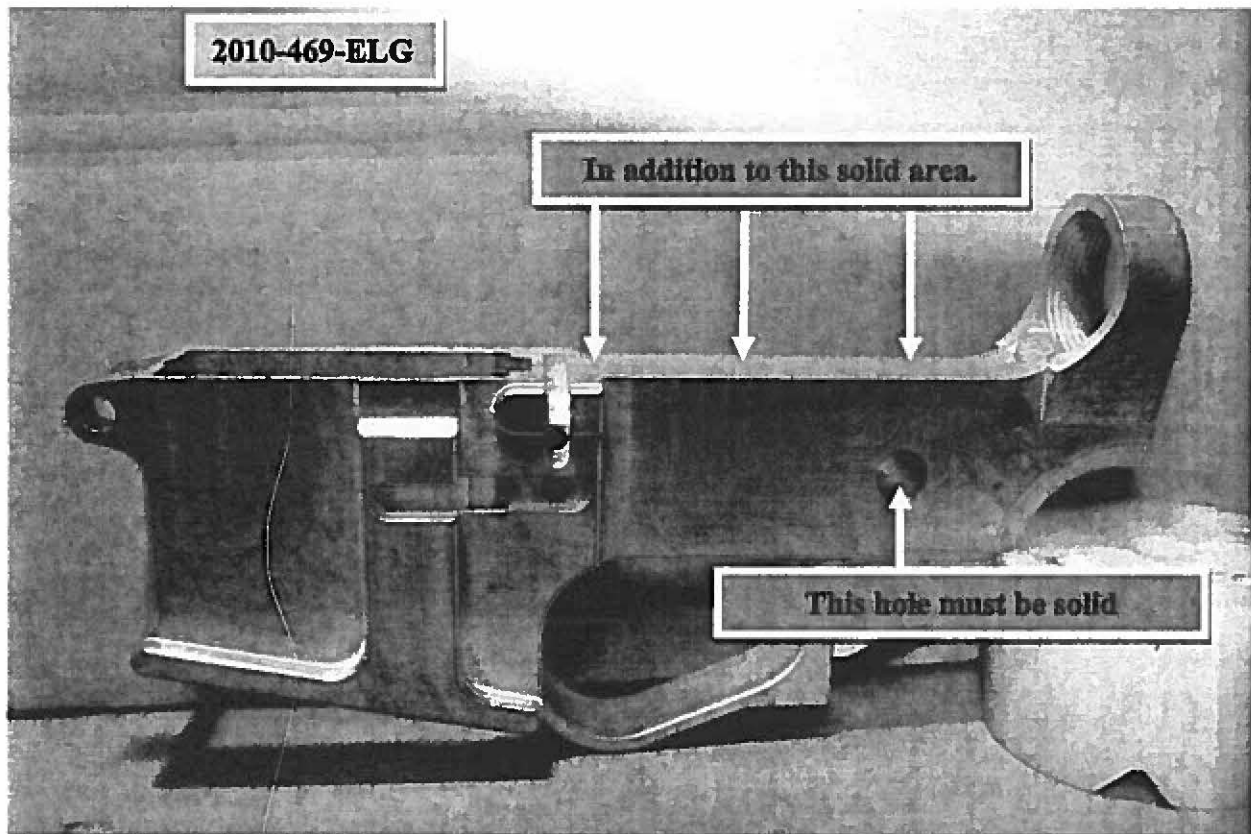


Exhibit "18"

ATF0091

-2-

Mr. Steve Carter

The following critical features were omitted:

- Material was removed from the sides of the fire-control cavity so that bolt guide rails could not be formed.
- Although the cavity for the locking block was formed, the locking surface against which the locking block of the bolt-assembly locks was left unformed, and material that would prevent the forming of such a locking surface by simple machining alone was removed.
- No guide rail formed for the gas piston.
- The opening in the front of the block for the gas piston was not formed or indexed.
- The installation/takedown hole for the hammer pin was not drilled; thus, if a bolt-assembly, gas piston, and cocking handle were installed, they could not be linked together.
- Provision not made for mounting a buffer assembly.

In order for this sample not to be considered a firearm receiver, along with the above noted modifications, one additional feature needs to be omitted from the design: The cavity formed for the toggling portion (the locking block) of the bolt-assembly must be omitted. We have filled in the noted area with clay and have enclosed a photo with this correspondence for your reference.

We caution that these findings are based on the sample as submitted. If the design, dimensions, configuration, method of operation, or materials used were changed, our conclusions would be subject to review.

The sample will be returned under separate cover using the return information provided.

We thank you for your inquiry, and trust the foregoing has been responsive. Please do not hesitate to contact us if you have additional questions.

Sincerely yours,

  
John R. Spencer  
Chief, Firearms Technology Branch

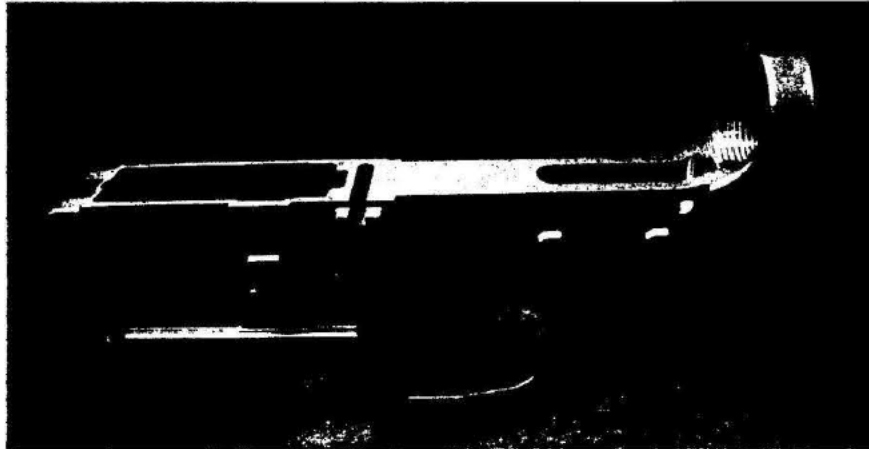
Enclosure

ATF0097

-2-

Mr. Kas McManus

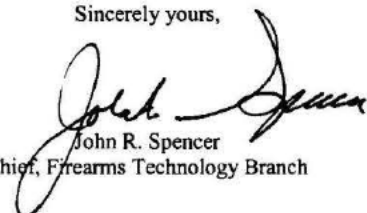
**Submitted item**



If your current design is modified to incorporate a takedown-pin lug clearance area of .800 inch or less in length, FTB is ready to reevaluate it as soon as we receive a new sample.

We thank you for your inquiry, regret that our present findings could not be more favorable, but trust that the foregoing has been responsive to your evaluation request.

Sincerely yours,

  
John R. Spencer  
Chief, Firearms Technology Branch

ATF0100

-3-

Mr. Davis L. Mueller

*Q: What machining can be done and still sell these as a "NON firearm"?*

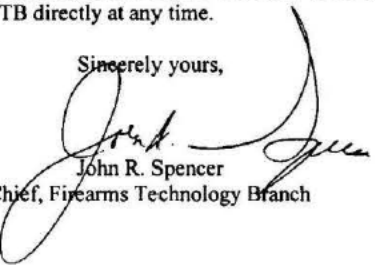
A: When manufacturing receiver blanks or castings for an EA-15, AR-15 type firearm, in order to ensure an "unfinished receiver" classification (i.e., the making of an item that has not been machined sufficiently for designation as a receiver), the likely procedure to follow is to refrain from drilling or machining of any kind in the left-side section, in the area of the trigger/hammer (fire-control) recess. This restraint would include the avoidance of any drilling/machining for trigger and mounting pivot-pin holes, or selector-lever holes). The resulting product could have all other machining operations performed, including takedown-pin hole(s) and clearance for the takedown-pin lug, but must be completely solid and un-machined in the fire-control recess area. We caution that the indexing of any of the fire-control pivot pins or the selector-lever locations is tantamount to forming them.

Also, we should point out for clarification purposes that, in the case of an AR-15 pattern receiver, the front of the takedown-pin lug clearance area merges with the back of the fire-control recess; thus it was necessary during our examination to determine the point at which the takedown-pin lug clearance area stops, and the fire-control recess begins. Accordingly, FTB has found that in order to be considered "completely solid and un-machined in the fire-control recess area," the takedown-pin lug clearance area must be no longer than .800 inch, measured from immediately forward of the front of the buffer retainer hole (see photo enclosed).

Additionally, when a left-side receiver blank as described above is possessed with a right-side receiver section, the right side section also must have no machining or drilling of any kind performed in the area of the trigger/hammer (fire-control) recess.

We trust that the foregoing has been responsive to your concerns. If we can be of further assistance, feel free to contact FTB directly at any time.

Sincerely yours,

  
John R. Spencer  
Chief, Firearms Technology Branch

Enclosure

ATF0105